Alternative Energy Portfolio Standard Report by the Public Utilities Commission to the General Assembly of the State of Ohio for Compliance Years 2009 and 2010

Issued August 15, 2012

Pursuant to Ohio Revised Code § 4928.64(D)(1)

in PUCO Case No. 12-1100-EL-ACP

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Ohio | Public Utilities Commission

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I. Executive Summary

Amended Substitute Senate Bill 221 (SB221) of the 127th General Assembly (2008 Ohio Laws S221, effective July 31, 2008, established Ohio's Alternative Energy Portfolio Standard (AEPS). The AEPS consists of both renewable energy resources and advanced energy resources. The AEPS contains specific compliance benchmarks for total renewable energy resources, including a specific solar requirement, beginning in 2009.

Tables 2 and 3 in the report summarize the compliance obligations and compliance performances for 2009 and 2010 respectively. Based on the companies' compliance filings, the 2009 non-solar renewable energy obligations were nearly fully satisfied. However, the solar requirements, and particularly the in-state solar requirement, proved challenging. These challenges resulted in numerous applications before the Commission seeking *force majeure* determinations, in which companies argued that there were inadequate existing solar resources to achieve compliance. The compliance deficiencies noted in the *force majeure* requests were rolled forward by the Commission and added to the 2010 compliance obligations. Compliance performance in 2010 was again very high for the non-solar renewable energy component. Performance with the solar requirement, while still short of full compliance, indicated a significant improvement as additional solar generating facilities came on-line. The Commission again ruled on several *force majeure* filings for the 2010 compliance year, with those shortfalls largely being added to 2011 compliance requirements.

The Commission, with the support of the National Association of Regulatory Utility Commissioners (NARUC), retained an outside consultant to evaluate a number of issues related to the state's AEPS. The NARUC report that resulted from this engagement was issued on September 2011 and filed on April 16, 2012 in **PUCO Case No. 12-1100-EL-ACP** is hereby incorporated by reference as Appendix C.

The Commission has been actively reviewing and certifying facilities under the AEPS, with more than 800 facilities having been certified as of December 31, 2010. The tables provided in Appendix A include details on the facilities certified by the Commission as of December 31, 2010, including data on the location of the facilities, the resources/technologies utilized, the facilities' generating capacity, and their on-line dates.

Appendix B includes details on compliance impediments listed by companies in their 2009 annual compliance status reports. As noted in the perceived impediments, the availability of an adequate supply of renewable energy credits (RECs) and solar RECs

(SRECs), particularly from in-state facilities, comprised the primary compliance challenges.

II. Acronyms

AEPS:	Alternative Energy Portfolio Standard
CRES:	Competitive Retail Electric Service
DC:	Direct Current
EDU:	Electric Distribution Utility
KW:	Kilowatts
MW:	Megawatts
MWHs:	Megawatt-hours
R.C.:	Ohio Revised Code
REC:	Renewable Energy Credit
RFP:	Request for Proposal
SB221:	Amended Substitute Senate Bill 221
SREC:	Solar Renewable Energy Credit

III. Statutory History

SB221 was signed by Governor Strickland on May 1, 2008, with an effective date of July 31, 2008. SB221 contained many significant components, including the creation of the state's new AEPS. The AEPS includes both advanced energy resources and renewable energy resources, as defined by Ohio Revised Code (R.C.) §4928.01(A)(34) and (35) respectively.

The AEPS is addressed most specifically in R.C. 4928.64, with additional supporting language also found in R.C. 4928.65. The overall requirement of the AEPS is that no less than twenty-five percent (25%) of retail electric sales by electric distribution utilities (EDUs) and competitive retail electric service (CRES) providers in the state be sourced from alternative energy resources by 2025, and each calendar year thereafter.

Of the 25% alternative energy resources requirement, the statute specified that at least half must come from renewable energy resources. Included within the renewable energy benchmarks is a specific requirement for solar resources (i.e., "solar carve out"). The statute further required that at least half of the renewable requirements be satisfied through facilities located in Ohio.

To implement the renewable component of the AEPS, the statute included specific annual benchmarks beginning in 2009, including the solar carve-out. The compliance efforts relative to these 2009 and 2010 renewable requirements constitute the focal point of this report. The requirements for 2009 and 2010, as dictated by R.C. 4928.64(B)(2), are as follows:

Year	Renewable Energy Resources	Solar Energy Resources	Non-Solar Energy Resources[1]
2009	0.25%	0.004%	0.246%
2010	0.50%	0.010%	0.490%

[1] "Non-Solar Energy Resources" is used in this context to represent the total renewable energy resource requirement net of the specific solar requirement

IV. Directive for Annual Report

The statute, specifically R.C. 4928.64(D)(1), included a requirement for a report by the Commission to the General Assembly. The Commission has prepared the following report, consistent with the following directive:

> The commission annually shall submit to the general assembly in accordance with section 101.68 of the Revised Code a report describing the compliance of electric distribution utilities and electric services companies with division (B) of this section and any strategy for utility and company compliance or for encouraging the use of alternative energy resources in supplying this state's electricity needs in a manner that considers available technology, costs, job creation, and economic impacts. The commission shall allow and consider public comments on the report prior to its submission to the general assembly. Nothing in the report shall be binding on any person, including any utility or company for the purpose of its compliance with any benchmark under division (B) of this section, or the enforcement of that provision under division (C) of this section.

The 2009 and 2010 compliance efforts of the electric distribution utilities and electric services companies are summarized in Sections VI. and VII. respectively.

Further, Appendix C includes a report described in greater detail in Section VIII. that addresses several potential means of encouraging the use of alternative energy resources.

V. Certification Activities

During the rulemaking process to implement the AEPS, the Commission proposed, and ultimately implemented, a certification process by which renewable energy generating facilities are evaluated to ensure their consistency with the requirements of R.C. 4928.64. This certification process is addressed in Commission Rule, Ohio Adm.Code 4901:1-40-04(F), and focuses primarily, but not exclusively, on the following considerations:

A. The resource or technology employed at the facility,
B. The placed-in service date of the facility,
C. The deliverability to the state of the facility's electrical output

The Commission first made its certification application form available in June 2009**.** Since that time, the application form has undergone revisions based on experience gained with the process. In addition, in October 2010, the Commission introduced an on-line application form to ensure consistency and efficiency in the overall process.

There is no fee associated with the voluntary application process, and the vast majority of these applications are processed under a 60 day auto-approval process, with certification issued on the 61st day after filing. However, some applications, either due to a need for additional information or due to facts unique to the application which may introduce novel policy consideration, are suspended for specific Commission consideration. All of the applications can be viewed on-line through the Commission's Docketing Information System, ensuring transparency for the process. The rule further permits interested persons to intervene in, and provide comments on, any certification proceeding.

Only renewable energy credits (RECs) and solar renewable energy credits (S-RECs) from PUCO-certified renewable energy generating facilities are recognized for AEPS compliance purposes. There are potentially eligible renewable facilities within the state that have not sought certification to date, perhaps because their renewable facilities were installed to satisfy a different objective. The output from such facilities would not be recognized under the AEPS. In addition, the Commission has certified facilities that were not operational at the time of certification. This should be considered when interpreting the numbers in Table 1 below. It should be noted, however, that RECs and S-RECs are a function of generation output, and therefore a non-operating facility is not capable of producing RECs or S-RECs.

As of December 31, 2010, the Commission had received approximately 1,260 applications as indicated by the table below.

Table 1.

	As of 12/31/2009	As of 12/31/2010
Applications Filed	187	1,259
Applications Certified	81	825
Applications Pending	90	402
Applications Suspended	0	4
Applications Denied	5	7
Applications Withdrawn	11	18
Applications Dismissed/Certificates Revoked	0	3

Additional details on the applications certified as of December 31, 2010, are provided in Appendix A to this report.

As indicated in Table 1, seven facilities have been denied certification as of December 31, 2010. Two of these facilities[2] were denied on the basis of failing to satisfy the statutory placed in-service date requirement, while the remaining five facilities[3] were deemed to have not satisfied the deliverability requirement.

For current facility certification data, please see the PUCO Ohio Renewable and Advanced Energy Portfolio Standard web page:
http://www.puco.ohio.gov/puco/index.cfm/industry-information/industry-topics/ohioe28099s-renewable-and-advanced-energy-portfolio-standard/

[2] Cases 09-751-EL-REN and 09-877-EL-REN

[3] Cases 09-555-EL-REN; 09-835-EL-REN; 09-836-EL-REN; 10-313-EL-REN; and 10-322-EL-REN

VI. Summary of 2009 Compliance Activities

The information in Table 2 below summarizes the 2009 compliance performances, as presented by the companies in their respective annual compliance status reports. The final resolution of these proceedings may support these figures, or the Commission may determine that revisions are warranted. The details for the CRES Providers have been aggregated so as to protect individual company data for which confidential treatment has been requested.

Renewable energy credits (RECs) and solar RECs (S-RECs) represent the compliance currency for Ohio's alternative energy portfolio standard. Based on the compliance status reports, the companies obtained RECs and S-RECs through several different means including, but not limited to, self-generation, brokers, residential REC programs, and the use of requests for proposals (RFPs).

Non-Solar Compliance

The figures for non-solar compliance, representing the total renewable requirement net of the specific solar requirement, show a total compliance obligation of 335,050 MWHs for 2009. Compliance with that total figure was nearly complete, with more than 99% of the total non-solar compliance obligation having been satisfied.

The minimum requirement for in-state non-solar resources totaled 167,528 MWHs, with actual performance exceeding that minimum requirement. As demonstrated by Table 2, the quantity above the minimum is attributed to the CRES providers in that several relied exclusively on in-state resources to satisfy their total non-solar requirement.

Solar Compliance

The total unadjusted solar obligation for 2009 was 5,452 MWHs, with approximately 26% of that requirement having been satisfied. The vast majority of the deficiency was addressed through Commission decisions on *force majeure* requests, such that the deficiencies were rolled forward to 2010.

The minimum requirement for in-state solar resources totaled 2,729 MWHs, with approximately 22% of that requirement having been satisfied. These numbers suggest that during the first year of the program, solar compliance, and particularly the in-state solar requirement, represented the greatest compliance challenge.

Table 2
2009 Compliance Summary Data
Source: Companies' annual compliance status report filings

	Non-Solar Renewables (MWHs)				Solar Renewables (MWHs)			
Company	Total Required	In-State Required	Total Obtained	In-State Obtained	Total Required	In-State Required	Total Obtained	In-State Obtained
CEI	42,228	21,114	42,228	21,114	687	344	23	5
Columbus Southern	49,052	24,526	49,052	24,526	798	399	68	68
Dayton Power & Light	28,714	14,357	28,714	14,357	468	234	265	31
Duke Energy – Ohio	42,281	21,141	42,281	21,141	688	344	608	264
Ohio Edison	51,387	25,694	51,387	25,694	836	418	27	6
Ohio Power	63,242	31,621	63,242	31,621	1,028	514	95	82
Toledo Edison	22,314	11,157	22,314	11,157	363	182	11	2
CRES Providers	35,832	17,918	35,444	19,610	584	295	327	157
TOTALS	335,050	167,528	334,662	169,220	5,452	2,729	1,424	615

Notes:
1) The numbers above are from the companies' annual compliance status report filings. The actual compliance obligations and performances may vary pending Commission review of the filings.
2) "Non-solar" is used in this context to represent the total renewable energy requirement net of the solar requirement.
3) The "In-State Requirement" is a minimum and is calculated as 50% of the total requirement.

CRES Providers who filed 2009 Annual Compliance Status Reports included the following: Constellation; Direct Energy Business; Direct Energy Services; Dominion Retail; DPLER; Duke Energy Retail Sales; FirstEnergy Solutions; Gexa Energy Ohio; IEU-OH; Integrys; and Sempra.

VII. Summary of 2010 Compliance Activities

The information in Table 3 below summarizes the 2010 compliance performances, as presented by the companies in their respective annual compliance status reports. The final resolution of these proceedings may support these figures, or the Commission may determine that revisions are warranted. The details for the CRES Providers have been aggregated so as to protect individual company data for which confidential treatment has been requested.

Based on the compliance status reports, the companies obtained RECs and S-RECs through several different means including, but not limited to, self-generation, brokers, residential REC programs, and the use of requests for proposals (RFPs).

Non-Solar Compliance

The figures for non-solar compliance, representing the total renewable requirement net of the specific solar requirement, show a total compliance obligation of 613,218 MWHs for 2010. Compliance with that total figure was nearly complete, with more than 99.9% of the total non-solar compliance obligation having been satisfied.

The minimum requirement for in-state non-solar resources totaled 307,611 MWHs, with actual performance exceeding that minimum requirement. As demonstrated by these figures, the quantity above the minimum is attributed to the CRES providers in that several relied exclusively on in-state resources to satisfy their total non-solar requirement.

Solar Compliance

The total solar obligation for 2010 was 16,496 MWHs, with approximately 90% of that requirement having been satisfied. The vast majority of the deficiency was addressed through Commission decisions on *force majeure* requests, such that the deficiencies were rolled forward to 2011.

The minimum requirement for in-state solar resources totaled 8,416 MWHs, with approximately 80% of that requirement having been satisfied. These numbers suggest that, while solar performance improved significantly from 2009, the in-state solar requirement continued to represent the greatest compliance challenge.

Table 3
2010 Compliance Summary Data
Source: Companies' annual compliance status report filings

	Non-Solar Renewables (MWHs)				Solar Renewables (MWHs)			
Company	Total Required	In-State Required	Total Obtained	In-State Obtained	Total Required	In-State Required	Total Obtained	In-State Obtained
CEI	80,052	40,026	80,052	40,026	2,298	1,156	1,729	587
Columbus Southern	95,847	47,923	95,847	47,923	2,687	1,343	2,687	1,343
Dayton Power & Light	58,213	29,107	58,213	29,107	1,391	797	1,391	797
Duke Energy – Ohio	49,502	24,751	49,502	24,751	1,090	585	1,090	585
Ohio Edison	100,350	50,175	100,350	50,175	2,857	1,436	2,151	730
Ohio Power	121,676	60,838	121,676	60,838	3,417	1,708	3,417	1,708
Toledo Edison	42,551	21,276	42,551	21,276	1,220	614	918	312
CRES Providers	65,027	33,515	64,809	34,555	1,536	777	1,401	672
TOTALS	613,218	307,611	613,000	308,651	16,496	8,416	14,784	6,734

Notes:
1) The numbers above are from the companies' annual compliance status report filings. The actual compliance obligations and performances may vary pending Commission review of the filings.
2) "Non-solar" is used in this context to represent the total renewable energy requirement net of the solar requirement.
3) The "In-State Requirement" is a minimum and is calculated as 50% of the total requirement.
4) The numbers in this table include any volumes carried forward to 2010 by virtue of 2009 *force majeure* decisions.

CRES Providers who filed 2010 Annual Compliance Status Reports included the following: AEP Retail Energy LLC; APN Starfist; BlueStar Energy Solutions; Champion Energy Services; Constellation NewEnergy; DERS; Direct Energy Business LLC; Direct Energy Services, Inc; Dominion Retail Inc; DPLER; FirstEnergy Solutions; Glacial Energy; IEU-OH; Integrys Energy Services; NextEra Energy Services; Noble Americas Energy Solution; and SMARTPapers.

VIII. Strategies / Policy Consideration

The Commission, with financial and administrative support of the National Association of Regulatory Utility Commissioners (NARUC), engaged Ed Holt & Associates, Inc. to determine Ohio's alternative energy market availability and potential, and to provide recommendations about methodologies for determining solar and non-solar renewable alternative compliance payment levels under Ohio's alternative energy portfolio standard. The report *Alternative Energy Resource Market Assessment* of September 30, 2011 is included as an attachment to this report.

Additionally, a training session was presented to PUCO staff on the cost of Renewable Energy Spreadsheet Tool (CREST) financial model used in the market assessment. This model was developed for the National Renewable Energy Laboratory to analyze the cost and economic drivers of renewable energy projects, and may be employed to help determine appropriate renewable energy compliance payment levels.

The Holt study also provided information about additional policies, deployment strategies, and incentives to improve market availability of eligible resources. The third section of the report addresses five policy approaches in promoting renewable energy development, all or some of which may potentially be useful for consideration in Ohio. They include long-term contracting policies, feed-in-tariffs, customer-sited or distributed generation support, tax incentives, and public benefit charges and fund administration. The Commission, in addition to monitoring and enforcing compliance with the standard, is also concerned with fostering strategies for compliance with the standard and encouraging the use of alternative generating resources with consideration given to available technology, costs, job creation, and economic impacts, as directed by the statute. Included within these strategies are the Commission's efforts to encourage the implementation of combined heat and power (CHP) applications as an alternative energy resource where appropriate.

Currently in the U.S., renewable energy policy and financial incentives are a continually evolving mix of federal and state level initiatives to promote cleaner, domestic energy sources and economic development. Further, renewable energy development and regulation are dramatically growing around the world in national and regional markets, and it is important for Ohio policymakers and stakeholders to keep informed about alternative polices and trends in relation to Ohio's own electricity portfolio standard, and develop additional policies or incentives as needed to support successful implementation of the standard.

APPENDIX A

1. PUCO Certified Renewable Energy Generating Facilities by Resource Type

Renewable Generation Type	FACILITIES CERTIFIED[2]			CAPACITY (megawatts)		
	Count	Ohio	Outside Ohio	Capacity	Ohio	Outside Ohio
Solar Photovoltaic	754	167	587	34.44	20.13	14.31
Wind	24	10	14	1,735.7	9.75	1,725.95
Hydroelectric	3	1	2	123.09	1.09	122
Solid Waste	2	2	-	42.8	42.80	-
Abandoned Coal Mine Methane	1	1	-	49	49	-
Totals:	**784**	**181**	**603**	**1,985.03**	**122.76**	**1,862.26**
Biomass/Biogas	**Count**	**Ohio**	**Outside Ohio**	**Capacity**	**Ohio**	**Outside Ohio**
Landfill Gas	27	7	20	321.72	98.12	223.6
Anaerobic Digestion	2	2	-	3	3	-
Food Processing	1	1	-	0.6	0.6	-
Wastewater Treatment	1	1	-	0.34	0.34	-
Wood Waste	1	1	-	177	177	-
Biomass/Biogas Totals:	**32**	**12**	**20**	**502.66**	**279.06**	**223.6**
CoFired[1]	**Count**	**Ohio**	**Outside Ohio**	**Capacity**	**Ohio**	**Outside Ohio**
Biomass	6	6	-	-	-	-
Paper Manufacturing	3	2	1	-	-	-
CoFired Totals:	9	8	1	-	-	-
Grand Totals:	**825**	**201**	**624**	**2,487.69**	**401.82**	**2,085.86**

1. CoFired projects have been included in the number of facilities certified but have been excluded from the megawatt capacity summary due to their variable nature
2. Facilities Certified through 12/31/2010

2. PUCO- Certified Renewable Energy Generating Facilities by State of Facility

State in Which Facility is Located	Facilities Certified	Capacity (megawatts)
Ohio	201	401.82
Indiana	25	1,006.80
Kentucky	31	16.91
Michigan	6	14.42
Pennsylvania	553	661.71
West Virginia	9	386.03
Other	0	0.00
Totals:	**825**	**2,487.69**

- Co-Firing Projects have been included in the number of facilities certified but have been excluded from the megawatt capacity summary due to their variable nature
- Facilities Certified through 12/31/2010

3. PUCO-Certified Solar PV Generating Facilities by State of Facility

State in Which Facility is Located	Solar Facilities Certified	Capacity (megawatts)
Ohio	167	20.13
Indiana	14	0.05
Kentucky	24	0.11
Michigan	3	0.02
Pennsylvania	540	14.11
West Virginia	6	0.03
Other	0	0.00
Totals:	**754**	**34.44**

- Facilities Certified through 12/31/2010

4. PUCO-Certified Solar PV Generating Facilities by Generating Capacity

Individual Generating Capacities of Solar PV Facilities	Facilities Certified
0 to 10 kW	502
10.1 kW to 30 kW	153
30.1 kW to 60 kW	39
60.1 kW to 100 kW	21
100.1 kW to 200 kW	26
200.1 kW to 1 MW	9
1.1 MW to 2 MW	1
2.1 MW and larger	3
Total:	**754**

- Facilities Certified through 12/31/2010

5. PUCO-Certified Ohio Solar PV Generating Facilities by On-Line Date

Facility On-Line Date	Solar Facilities Certified	Capacity (megawatts)
Pre 8/1/2008	33	0.34
8/2/2008 - 12/31/2008	13	0.30
2009	58	1.64
2010	59	17.43
Totals:	**163**	**19.70**

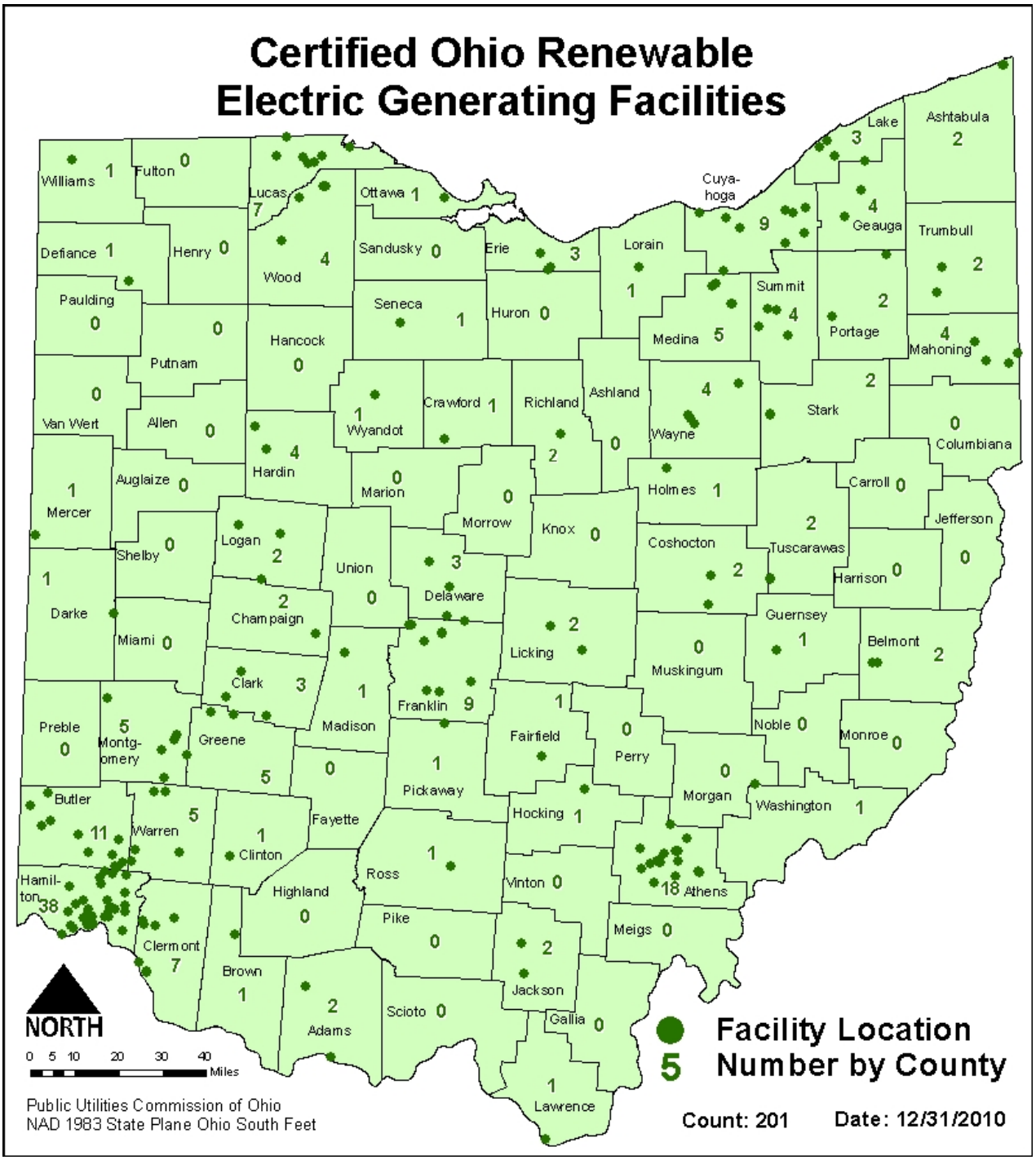
- Facilities Certified through 12/31/2010

6. PUCO-Certified Ohio Wind Facilities by On-Line Date

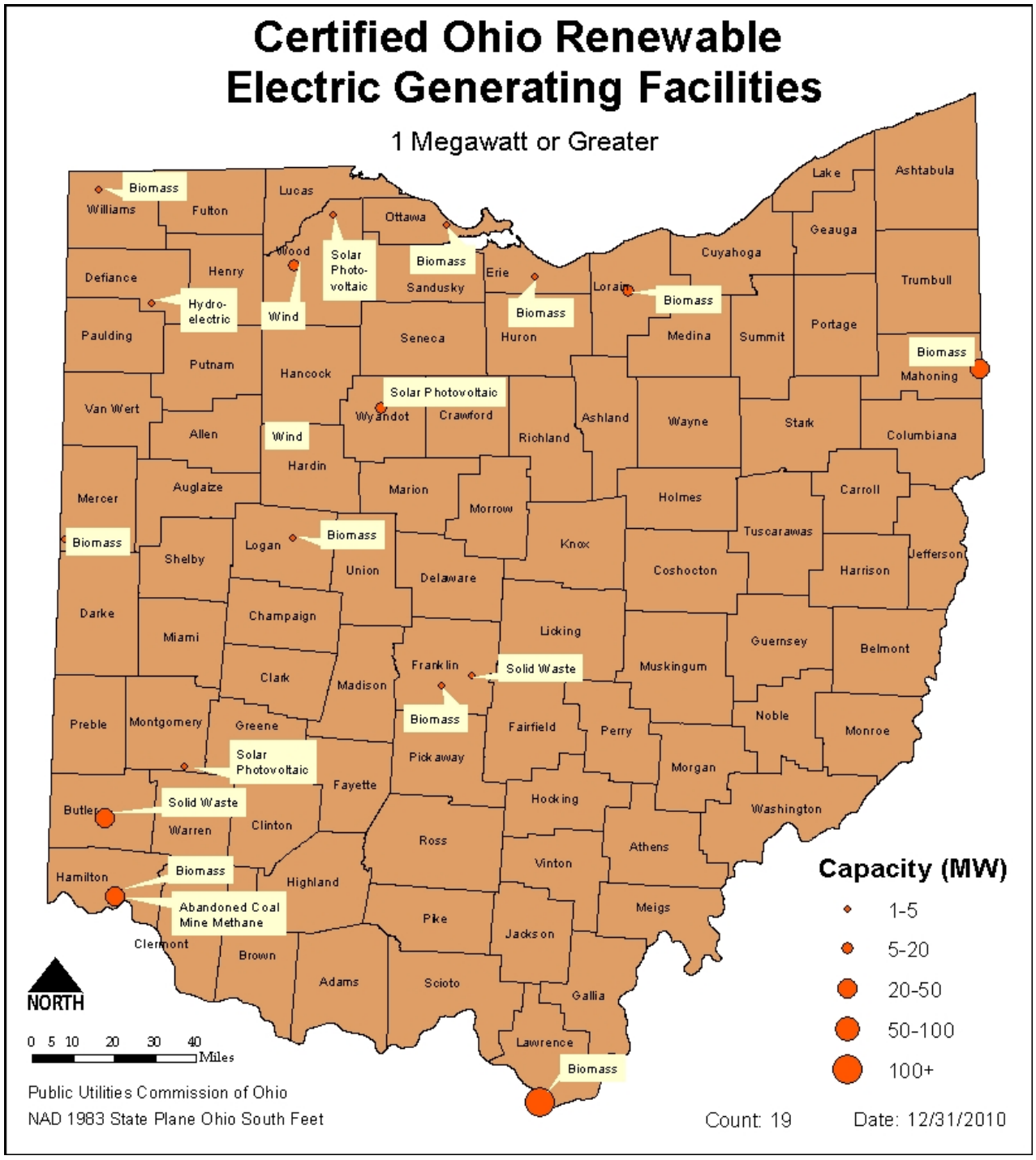
Facility On-Line Date	Wind Facilities Certified	Capacity (megawatts)
Pre 8/1/2008	3	7.22
8/2/2008 - 12/31/2008	0	0.00
2009	3	0.32
2010	4	2.21
Totals:	**10**	**9.75**

- Facilities Certified as through 12/31/2010

7. Certified Ohio Renewable Electric Generating Facilities Count and Location Map



8. Certified Ohio Renewable Electric Generating Facilities One Megawatt or Greater Map



APPENDIX B
Perceived Impediments

Ohio Adm.Code 4901:1-40-03(C) requires affected companies to submit a report annually that describes their non-binding compliance plans over a ten-year planning horizon. Included within this rule is a requirement to address perceived impediments to achieving compliance with the AEPS requirements and to suggest means for addressing such impediments.

Perceived impediments listed in the 2009 compliance status reports included, but were not limited to, the following:

- "Presently there appears no viable resource or generators from which suppliers can obtain REN Solar RECs in order to satisfy the REC requirement. If the current state of Solar REC generation (or lack thereof) continues Gexa perceives that this impediment might result in substantial costs over time towards its fulfillment of its Solar REC requirement."[4]

- "Despite CRES' good faith efforts for full compliance, there is insufficient liquidity in the REC and S-REC market and few RECs and S-RECs are available through bilateral contracts."[5]

- "Current lack of in-state resources will make annual compliance challenging for Solar and Non-Solar requirements. A CRES' ability to hedge its Solar requirement will hinge on the development of in-state facilities."[6]

- "REC market liquidity is the largest impediment faced by all the electric service providers. An insufficient number of solar facilities sited either within or outside of Ohio exist to meet the statutory requirements. Further, the verification process the Commission has laid out, while comprehensive and auditable, will take time to implement. Currently, there are numerous applications from renewable generators seeking

[4] P. 4 of Gexa filing in Case No. 10-496-EL-ACP

[5] P. 4 of Integrys filing in Case No. 10-507-EL-ACP

[6] P. 4 of Constellation filing in Case No. 10-495-EL-ACP

renewable energy certification. Some of these are facing opposition and may require hearings. These factors have created a circumstance whereby the number of certified facilities is small in comparison with the statutory requirements."[7]

- " … Dominion Retail sees the current limited availability of Ohio-sourced solar RECs as the principal impediment to benchmark compliance. Although Dominion Retails hopes that the current state and federal incentives for installing solar generation will remedy this problem, if these incentives prove ineffective or if the incentives are reduced or eliminated in the future, it may be that the Ohio solar benchmarks will be impossible to achieve. Should this occur, it may be necessary for the legislature to revisit the efficacy of this component of the requirement."[8]

- "The most significant impediment to achieving compliance (particularly for solar renewable energy resources) is the limited availability of renewable energy resources. Such limited availability is exacerbated by the legislative requirement that fifty percent of the renewable energy resource requirement originate from facilities located within Ohio, and the regulatory requirement that renewable energy resource facilities be certified by the Public Utilities Commission of Ohio."[9]

- "While there are factors that influence demand, and the benchmarks are aggressive, the quantity of RECs needed annually by each entity can be easily derived, but the supply side of the equation is subject to much more volatile factors. These factors have included such items as available capital and associated timing for self-build options, interpretation of pending final Commission rules, number of suppliers submitting projects for certification by the PUCO, speculators and entities subject to the benchmark acquiring RECs beyond current year compliance and banking for the allowable five year period."[10]

[7] P. 4 of Direct Energy Business LLC filing in Case No. 10-0497-EL-ACP

[8] P. 6 of Dominion Retail filing in Case No. 10-2987-EL-ACP

[9] P. 5 of Ohio Edison/Toledo Edison/Cleveland Electric Illuminating filing in Case No. 10-506-EL-ACP

[10] P. 9 of Columbus Southern Power/Ohio Power filings in Case Nos. 10-484-EL-ACP and 10-485-EL-ACP

In terms of addressing the perceived impediments, the following suggestions were offered:

- The Commission should " … remain flexible in the event regulatory relief is necessary as this new market develops."[11]

- "Commission Staff should continue its policy of diligent and comprehensive review of all applications. Commission staff should also recognize the developmental stage of the REC market and implement the REC requirements in a fashion that recognizes the imbalance between the renewable energy portfolio percentages envisioned in the regulations and actual available Ohio sited RECs."[12]

[11] P. 6 of Ohio Edison/Toledo Edison/Cleveland Electric Illuminating filing in Case No. 10-506-EL-ACP

[12] P. 4 of Direct Energy Business LLC filing in Case No. 10-497-EL-ACP

APPENDIX C

Alternative Energy Resource Market Assessment

The NARUC report, Alternative Energy Resource Market Assessment, issued on September 30, 2011, was filed on April 16, 2012 in Case No. **12-1100-EL-ACP** and is posted on the Commission's website at :
http://dis.puc.state.oh.us/DocumentRecord.aspx?DocID=dd628c78-b6e5-4fe3-9108-e585271602a8.

The Public Utilities Commission of Ohio

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Summary: Report Alternative Energy Portfolio Standard Report by the Public Utilities Commission
to the General Assembly of the State of Ohio for Compliance Years 2009 and 2010
electronically filed by Richard M Bulgrin on behalf of Public Utilities Commission of Ohio